

Declaration of Shayla Myers

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2 1. I am an attorney at the Legal Aid Foundation of Los Angeles
3 and an attorney in this matter. If called to testify, I could testify accurately
4 to the facts herein.

5 2. On March 11, 2016, I was present at the corner of 6th Street and
6 Towne Avenue at approximately 9:30 a.m.

7 3. I saw members of the Los Angeles Police Department,
8 including individuals I recognized as Sergeant Hamer and Lieutenant
9 Mathes, who are defendants in this lawsuit, present at the scene along with
10 individuals who were wearing vests for LA Sanitation and other individuals
11 in white Hazmat suits.

12 4. I observed LAPD officers taping off an area with yellow police
13 tape, near where I was standing. This included taping off an extensive area
14 that appeared to me to include the property of more than one person based
15 on the items I viewed in the taped off area. I was standing within 10 feet of
16 a red tent, which was in that area that was taped off. I observed that the tent
17 appeared to be intact. I am aware from working on this case and other cases
18 involving homeless individuals in the Skid Row area, that individuals on
19 Skid Row are allowed to have tents up between the hours of 9:00 p.m. and
20 6:00 a.m. under the settlement in *Jones v. City of Los Angeles*, I am also
21 aware that the Los Angeles Police Department and security officers from the
22 Business Improvement District tell individuals that they must collapse their
23 tents during the day pursuant to Los Angeles Municipal Code Section
24 41.18(d), and that under Los Angeles Municipal Code Section 56.11, a
25 person is required to have their tent down during the day.

26 5. At approximately 10:00 a.m., I began taking video of what I
27 observed. A true and correct copy of the video I took on my cell phone,
28 beginning at approximately 10:00 a.m., is attached as Exhibit 23. I have

1 reviewed this video, and they fairly and accurately depict what I observed
2 that day. Beginning at the 1:44 minute mark in the footage, an individual in
3 a white overalls and a green vest that appears to say "City of Los Angeles"
4 is depicted using a knife to cut the red tent, and then using his hands to
5 continue to rip the tent. Along with the another individual in white overalls
6 and a blue vest, the individual is seen pulling and throwing the tent poles.
7 This continues for approximately one minute. At the foreground of the
8 video is Lieutenant Mathes of the Los Angeles Police Department, who I
9 recognized from his name badge, which is also depicted in the video
10 footage.

11 6. At approximately the 11:49-12:05 minute mark of the footage,
12 another individual in white overalls and a black hat is depicted ripping more
13 of the tent as other individuals take belongings from the tent and throw them
14 either on the sidewalk or into the green Sanitation truck that has pulled up
15 next to the tent. At the foreground of the video, an individual in a green City
16 of Los Angeles vest is depicted throwing at least four bicycle wheels in the
17 Sanitation truck.


18 7. Almost immediately after the first video ended, I began taking a
19 second video. A true and correct copy of that video, which I also took on
20 my cell phone, is attached as Exhibit 24. This video is taken at the same
21 location as the first video. The video is a true and accurate representation of
22 what I observed.

23 8. At approximately the 00:40 minute mark of Exhibit 24,
24 individuals in white overalls and others in green City of Los Angeles vests
25 are seen carrying the tent and throwing it into the green City Sanitation
26 truck. At approximately the 1:33 minute mark, an individual in a green City
27 of Los Angeles vest is seen picking up and throwing a bicycle frame into the
28 Sanitation truck along with other items. The individual in the green vest and

1 numerous other individuals in green vests are not wearing the white overalls
2 and are seen handling and throwing the individual's belongings into the
3 green Sanitation truck. At approximately the 2:45 minute mark, the video
4 depicts the green Sanitation truck lifting and it appears to be dumping the
5 contents in the back of the Sanitation truck. At approximately the 3:24
6 minute mark, the footage depicts another individual in white overalls
7 throwing another bicycle frame into the Sanitation truck.

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9 I swear under penalty of perjury that the foregoing is true and correct.

10 Executed this 8th day of April 2016 at Los Angeles, California.

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